

WALDER HAYDEN & BROGAN, P.A.
Melvyn H. Bergstein (MB6405)
5 Becker Farm Road
Roseland, NJ 07068
(973) 992-5300

LAW OFFICE OF ELLEN O'CONNELL, L.L.C.
Ellen O'Connell (EO0456)
30 Columbia Turnpike, P. O. Box 132
Florham Park, NJ 07932-0132
(973) 295-6800

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

SALLY WHITE,

Plaintiff,

v.

SMITHS DETECTION, INC., et al.,

Defendants.

CIVIL ACTION NO.:
2:10-cv-04078-KM-MAH

NOTICE OF MOTION

TO:

Sarah Bouchard, Esq.
Morgan Lewis
1701 Market St.
Philadelphia, PA 19103

Michael Potenza, Esq.
Debevoise & Plimpton LLP
919 Third Avenue
New York, NY 10022

PLEASE TAKE NOTICE that on Monday, June 3, 2013 at 9:00 A.M. or as soon thereafter as counsel may be heard, the undersigned attorneys for the

Plaintiff, Sally White, will make application to the Hon. Michael A. Hammer, for an Order as follows:

A. Sealing and otherwise restricting public access to materials filed with the Court or utilized in connection with judicial decision-making, pursuant to Local Civil Rule 5.3(c).

PLEASE TAKE FURTHER NOTICE that the Plaintiff will rely on the accompanying Certification of Ellen O'Connell, Esq., and the accompanying Letter- Brief in Support of the Motion.

Respectfully submitted,

WALDER HAYDEN & BROGAN, P.A.
5 Becker Farm Road
Roseland, NJ 07068
(973) 992-5300

By: s/Melvyn H. Bergstein
Melvyn H. Bergstein (MB6405)

LAW OFFICE OF ELLEN O'CONNELL, L.L.C.
30 Columbia Turnpike, P. O. Box 132
Florham Park, NJ 07932-0132
(973) 295-6800

Dated: May 10, 2013

By: s/Ellen O'Connell
Ellen O'Connell, Esq. (EO0456)

CERTIFICATION OF SERVICE

Ellen O'Connell hereby certifies as follows:

I am an attorney at law of the State of New Jersey and the Principal Member of the Law Office of Ellen O'Connell, L.L.C., counsel to the Plaintiff, Sally White.

I certify that I filed electronically true versions of (1) the Plaintiff's Notice of Motion for Seal or otherwise restrict access to materials or judicial proceedings under Local Civil Rule 5.3(c)(2), (2) the Certification of Ellen O'Connell and (3) the Plaintiff's Letter-Brief in Support of the Motion this day, Friday, May 10, 2013; that copies are available for viewing and downloading from the U.S. District Court's ECF System, and true copies were also served this day on the following counsel of record for the Defendants:

Sarah Bouchard, Esq.
Morgan Lewis & Bockius, LLP
1701 Market St.
Philadelphia, PA 19103

Michael Potenza, Esq.
Debevoise & Plimpton LLP
919 Third Avenue
New York, NY 10022

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

s/Ellen O'Connell
Ellen O'Connell (EO0456)

Dated: May 10, 2013